

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI – DIVISION 5**

SUZETTE K. ANDREASON)
2469 Luminous Stars Street)
Henderson, Nevada 89044)
Plaintiff,)
vs.) Case No. 5:13-cv-06040-BP
) Division: 5
CAMERON REGIONAL MEDICAL CENTER)
d/b/a PATTONSBURG MEDICAL CLINIC; and)
CAMERON REGIONAL MEDICAL CENTER, INC.)
)
Defendants,)

AMENDED COMPLAINT

COMES NOW the Plaintiff Suzette K. Andreason, by and through her attorney, Thomas R. Hill, and for her cause of action, alleges and states as follows:

1. That Plaintiff Suzette K. Andreason is a resident of the State of Nevada.
2. That Plaintiff Suzette K. Andreason was lawfully married to Dan L. Andreason, deceased, until he died at North Kansas City Hospital on April 7, 2010.
3. That Defendant Cameron Regional Medical Center d/b/a Pattonsburg Medical Clinic is owned by or a subsidiary of Defendant Cameron Regional Medical Center, Inc.
4. That Defendant Cameron Regional Medical Center is vicariously liable for the negligent acts and omissions of its clinic, Defendant Cameron Regional Medical Center d/b/a Pattonsburg Medical Clinic.
5. That jurisdiction and venue in the United States District Court Western District of Missouri is proper based on diversity jurisdiction.
6. That Plaintiff Suzette K. Andreason's Motion to Amend was granted on January 13, 2014.

Count I

7. That decedent Dan L. Andreason became a patient of Defendant Pattonsburg Medical Clinic on or about December 13, 2005 and continued to treat at Defendant Pattonsburg Medical Clinic until March 29, 2010.
8. That while decedent Dan L. Andreason was a patient of Defendant Pattonsburg Medical Clinic, the healthcare providers ordered and had laboratory work performed on March 28, 2006, July 11, 2008 and September 29, 2009.
9. That Defendant Cameron Regional Medical Center d/b/a Pattonsburg Medical Clinic was negligent as it failed to properly diagnose and test Dan L. Andreason, deceased, for cardiovascular disease.
10. That Defendant Cameron Regional Medical Center d/b/a/ Pattonsburg Medical Clinic knew that in early 2008, Dan L. Andreason, deceased, had cardiovascular issues including high cholesterol, increased lipids and hypertension.
11. That Defendant Cameron Regional Medical Center d/b/a Pattonsburg Medical Clinic which “offers world-class healthcare to residents throughout the greater Kansas City, Saint Joseph area and Cameron community” failed to test the decedent Dan L. Andreason for:
 - a. MPO; myeloperoxidase;
 - b. C-reactive protein;
 - c. Fibrinogen;
 - d. Homocysteine; and
 - e. Natriuretic peptides.
12. That Defendant Cameron Regional Medical Center d/b/a Pattonsburg Medical Clinic was negligent in not adequately and properly conducting blood tests which, if performed, would have lead to the diagnosis and prediction of Dan L. Andreason’s, deceased, cardiovascular condition prior to his fatal heart attack which caused his death on April 7, 2010.
13. That had Defendant Cameron Regional Medical Center d/b/a Pattonsburg Medical Clinic adequately and properly diagnosed and tested the decedent, Dan L. Andreason, his cardiovascular condition and subsequent fatal heart attack could have been predicted with 95 percent accuracy.

14. That had Defendant Cameron Regional Medical Center d/b/a Pattonsburg Medical Clinic prudently referred the decedent, Dan L. Andreason, to a fully licensed Medical Doctor qualified to adequately and properly treat, diagnose, and order blood tests/laboratory work instead of relying on a PA-C's opinion, Defendant Cameron Regional Medical Center would have detected decedent's serious cardiovascular condition and provided "world class healthcare" including but not limited to referring him to a cardiologist at Defendant Cameron Regional Medical Center or elsewhere.
15. That Defendant Cameron Regional Medical Center d/b/a Pattonsburg Medical Clinic which sets its standard of care as "world class healthcare" negligently and carelessly failed to recognize, diagnose and treat the acute myocardial infarction which ultimately lead to and proximately caused the wrongful death of Dan L. Andreason on April 7, 2010 at North Kansas City Hospital.
16. That Plaintiff Suzette K. Andreason has sustained injuries and damages including medical expenses, lost wages, loss of consortium, loss of services, mental anguish and other damages as a direct and proximate result of the careless and negligent acts and omissions of Defendant Cameron Regional Medical Center d/b/a Pattonsburg Medical Clinic and Defendant Cameron Regional Medical Center, Inc.

WHEREFORE, Plaintiff Suzette K. Andreason requests the Court to enter a Judgment in her favor for a sum in excess of Seventy-Five Thousand and no/100 Dollars (\$75,000.00), costs, interest pursuant to law and for such other and further relief as the Court deems just and equitable.

Respectfully Submitted,

THOMAS R. HILL, LLC

Dated: January 16, 2014

/s/ Thomas R. Hill
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JURY TRIAL DEMAND

COMES NOW the Plaintiff Suzette K. Andreason and demands a jury trial on all issues so triable.

CERTIFICATE OF SERVICE

I, hereby, certify on the 16th day of January, 2014, the above and forgoing document was filed via the CM/ECF system and the above and forgoing document was sent via electronic mail to the following:

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ATTORNEYS FOR THE DEFENDANTS

By:

/s/Thomas R. Hill
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